

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10384-PBS

UNITED STATES

v.

DANIEL KAMEN

**DEFENDANT'S REQUEST FOR INDIVIDUAL VOIR DIRE
REGARDING THE NATURE OF THE CHARGES**

Pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, the defendant Daniel Kamen moves that the Court question the venire individually, out of the hearing of the other venire members, with respect to their ability to consider the charges of receipt of child pornography in a fair and unbiased manner. In support of this motion the defendant states:

1. Experience proves that potential jurors will give more candid answers to the Court about their attitude towards highly charged, emotional issues if the questioning takes place outside the presence of other venire members. The charges in this case, receipt of child pornography, are likely to deeply offend many members of the venire. The defendant is concerned that those deep-seated prejudices will not come to light if voir dire questions are posed to the venire as a whole. Individual voir dire can be conducted expeditiously and without unnecessarily lengthening what is expected to be a short, three day trial.

Respectfully submitted,
DANIEL KAMEN
By his attorneys,

/s/ Charles W. Rankin

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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on October 30, 2006

/s/ Charles W. Rankin

Charles W. Rankin